

**THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE: : Chapter 13
: :
ANGELINA GEIGER, : Case No. 20-13311 (MDC)
: :
: Debtor. :

**NOTICE OF MOTION,
RESPONSE DEADLINE AND HEARING**

PLEASE TAKE NOTICE THAT Police and Fire Federal Credit Union (“PFFCU”) has filed a Motion (the “Motion”) for an Order Granting the Automatic Stay to Exercise Rights with respect to 1119 N. 63rd Street, Philadelphia, Pa 19151 (the “Real Property”) with the Court.

1. **Your rights may be affected.** You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult an attorney).
2. **If you do not want the Court to grant the relief sought in the Motion** or if you want the Court to consider your views on the Motion, then on or before **September 17, 2021**, you or your attorney must file a response to the Motion. (See Instructions on next page).
3. A hearing on the Motion is scheduled to be held before the Honorable Magdeline D. Coleman, on **September 28, 2021 at 10:30 a.m.** at the United States Bankruptcy Court, Courtroom #4, 900 Market Street, Philadelphia, Pennsylvania, 19107. Unless the court orders otherwise, the hearing on this contested matter will be an **evidentiary hearing**.
4. **If you do not file a response to the Motion**, the court may cancel the hearing and enter an order granting the relief requested in the Motion.
5. You may contact the Bankruptcy Clerk’s Office at 215-408-2800 to find out whether the hearing has been canceled because no one filed a Response.
6. If a copy of the Motion is not enclosed, a copy of the Motion will be provided to you if you request a copy from the attorney whose name and address is listed on the next page of this Notice.

Filing Instructions

1. **If you are required to file documents electronically by Local Bankruptcy Rule 5005-1,** you must file your response electronically.
2. **If you are not required to file electronically,** you must file your response at

**United States Bankruptcy Court
Eastern District Of Pennsylvania
Clerk's Office
900 Market Street, Suite 400
Philadelphia, PA 19107**

3. **If you mail your response** to the bankruptcy clerk's office for filing, you must mail it early enough so that it will be received on or before the date stated in Paragraph 2 on the previous page of this Notice.
4. On the same day that you file or mail your Response to the Motion, you must mail or deliver a copy of the Response to the movant's attorney:

Yonit A. Caplow, Esquire
Dilworth Paxson, LLP
1500 Market Street, Suite 3500E
Philadelphia, PA 19102
(215) 575-7000
(215) 757-7200 (fax)
ycaplow@dilworthlaw.com

Dated: September 3, 2021
Philadelphia, Pennsylvania

/s/ Yonit A. Caplow

DILWORTH PAXSON LLP
Yonit A. Caplow
1500 Market St., Suite 3500E
Philadelphia, PA 19102
Telephone: (215) 575-7000
Facsimile: (215) 575-7200

Attorneys for Police and Fire Federal Credit Union